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Counsel for Calpine Corporation, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E Corporation, Pacific Gas & Electric
Company,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Chapter 11

Case No. 19-30088 (DM)

(Lead Case)
(Jointly Administered)

**MOTION FOR ORDER
AUTHORIZING WITHDRAWAL OF
COUNSEL**

1 **Facts**

2 1. Calpine respectfully submits this Motion for Order Authorizing Withdrawal of Counsel of
3 Ameneh M. Bordi to Calpine Corporation (the "Motion") pursuant to Rules 7007-1, 9013-1, 9013-2,
4 9013-3 and 9014-1 of the Bankruptcy Local Rules.

5 **Argument**

6 2. Pursuant to Rule 11-5(a) of the Local Civil Rules in force in the Northern District of
7 California, "counsel may not withdraw from an action until relieved by order of Court after written notice
8 has been given reasonably in advance to the client and to all other parties who have appeared in the case."

9 3. Cause exists for Ms. Bordi to withdraw as counsel to Calpine Corporation in the
10 above-captioned cases because Ms. Bordi will no longer be affiliated with Calpine Corporation's counsel
11 Kirkland & Ellis LLP.

12 **Conclusion**

13 4. For the foregoing reasons and for the reasons set forth in the Declaration of
14 Ameneh M. Bordi, submitted in support of this Motion, Calpine Corporation respectfully requests that the
15 Court enter an Order granting the Ameneh M. Bordi leave to withdraw as counsel of record for Calpine
16 Corporation.

1 DATED: January 28, 2021

KIRKLAND & ELLIS LLP

3 By: /s/ Michael P. Esser

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